

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CONOCOPHILLIPS GULF OF PARIA B.V.,

Plaintiff,

v.

CORPORACIÓN VENEZOLANA DEL
PETRÓLEO, S.A., and PETRÓLEOS DE
VENEZUELA, S.A.,

Defendants.

Case No. 1:22-mc-00264-UNA

**MOTION FOR AN ORDER AUTHORIZING
THE ISSUANCE OF A WRIT OF *FIERI FACIAS***

ConocoPhillips Gulf of Paria B.V. (“Plaintiff”) hereby moves, pursuant to Federal Rule of Civil Procedure 69, 10 *Del. C.* § 5031, and 8 *Del. C.* § 324, and 28 U.S.C. § 1610(c), for an order authorizing the issuance of the Plaintiff’s proposed writ of *feri facias* against the shares of the Delaware corporation PDV Holding, Inc. (“PDVH”) owned by the Judgment Debtor Petróleos de Venezuela, S.A. (“PDVSA”), and against any other assets or rights PDVSA may have incident to its ownership of those shares, on the same terms prescribed by the Court in parallel litigation described in more detail in the attached supporting Brief.

The bases for this motion are set forth in the Opening Brief in Support of Plaintiff’s Motion for an Order Authorizing the Issuance of a Writ of *Fieri Facias*; the Declaration of Marcus J. Green, dated June 14, 2022, and its accompanying exhibits, including Plaintiff’s proposed order, proposed *praecipe* and proposed writ of *feri facias*.

Respectfully submitted,

Of Counsel:

Michael S. Kim
Marcus J. Green
Josef M. Klazen
KOBRE & KIM LLP
800 Third Avenue
New York, NY 10022
(212) 488-1200
michael.kim@kobrekim.com
marcus.green@kobrekim.com
jef.klazen@kobrekim.com

Dated: June 15, 2022

ROSS ARONSTAM & MORITZ LLP

/s/ Garrett B. Moritz
Garrett B. Moritz (Bar No. 5646)
Elizabeth M. Taylor (Bar No. 6468)
Hercules Building
1313 North Market Street, Suite 1001
Wilmington, DE 19801
(302) 576-1600
gmoritz@ramllp.com
etaylor@ramllp.com

Attorneys for Plaintiff